

ISMAIL J. RAMSEY (CABN 189820)
United States Attorney

THOMAS A. COLTHURST (CABN 99493)
Chief, Criminal Division

ERIC CHENG (CABN 274118)
AJAY KRISHNAMURTHY (CABN 305533)
ALETHEA M. SARGENT (CABN 288222)
Assistant United States Attorneys

1301 Clay Street, Suite 340S
Oakland, California 94612
Telephone: (510) 637-3680
FAX: (510) 637-3724
eric.cheng@usdoj.gov
ajay.krishnamurthy@usdoj.gov
alethea.sargent@usdoj.gov

Attorneys for United States of America

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

UNITED STATES OF AMERICA,)	CASE NO. 4:23-cr-0268 JSW-1
)	
Plaintiff,)	STIPULATION REGARDING PROPERTY BOND
)	AND ORDER
v.)	
)	
DANIEL HARRIS,)	
)	
Defendant.)	

Pursuant to General Order No. 55, it is hereby stipulated by and between counsel for the United States and counsel for Defendant DANIEL HARRIS that the government has reviewed and approved Defendant's bond package for Defendant's submission to the clerk's office.

Defendant was charged in an Indictment dated August 16, 2023 with violations of 18 U.S.C. §§ 846, 841(a)(1) and (b)(1)(E)(i), conspiracy to distribute and possess with intent to distribute anabolic steroids, 18 U.S.C. §§ 846, 841(a)(1) and (b)(1)(E)(i), attempted possession with intent to distribute anabolic steroids, and 18 U.S.C. §§ 841(a)(1) and (b)(1)(E)(i), possession with intent to distribute anabolic steroids. Defendant appeared before the Court on August 29, 2023, for his initial appearance in

STIPULATION REGARDING PROPERTY AND ORDER
Case No. 4:23-cr-0268 JSW-1

1 this district. The Court ordered certain conditions of release, including the posting of a secured bond in
 2 the amount of \$100,000. On September 1, 2023, the co-owner of the property at issue appeared before
 3 the Court and agreed to cosign on the bond as a surety. The deadline for the posting of that property was
 4 set for September 12, 2023.

5 The government understands that due to defense counsel's unfamiliarity with Texas real estate
 6 transactional requirements, defense counsel was only able to finalize the bond package as of October 24,
 7 2023. Therefore, the parties further stipulate and agree that the original deadline for posting of property
 8 should be extended to October 25, 2023.

9 On October 24, 2023, defense counsel presented to the government that bond package, which
 10 includes a valuation based on real estate comparables, including from a real estate aggregator such as the
 11 Zillow website or the Redfin website. The parties stipulate and agree that, for purposes of that secured
 12 bond in this case, the government will accept such a valuation.

13 The undersigned Assistant United States Attorney certifies that they have obtained approval from
 14 counsel for Defendant to file this stipulation and proposed order.

15
 16 IT IS SO STIPULATED.

17 DATED: October 24, 2023

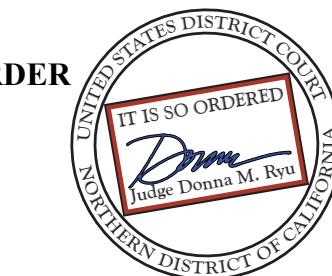
18 _____
 19 /s/
 20 ERIC CHENG
 21 AJAY KRISHNAMURTHY
 22 ALETHEA M. SARGENT
 23 Assistant United States Attorneys

24 _____
 25 /s/
 26 JAMES P. VAUGHNS
 27 Counsel for Defendant

28 **ORDER**

IT IS SO ORDERED.

DATED: October 24, 2023



 HONORABLE DONNA M. RYU
 Chief Magistrate Judge